

JUDGE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR14-232-JLR
)	
Plaintiff,)	
)	
v.)	MOTION TO SEAL EXHIBITS
)	
DAVID RICHARD SCHULTZ, II,)	
)	
Defendant.)	

David Richard Schultz, II, through counsel, moves this Court to order that Exhibits 2, 4, and 11 that are referenced in Defendant's Sentencing Memorandum be filed under seal and secured from public access until further order of the Court. This motion is based on the confidential nature of information contained in the exhibits, which if made public could result in irreparable harm to the defendant. Specifically, the exhibits contain sensitive psychological, personal, and financial information pertaining to Mr. Schultz, his family, and his codefendant. The right of access is outweighed by the interests of both the public and the parties in protecting the substance of these documents from public view. There is compelling reason to order that Exhibits 2, 4, and 11 be sealed.

DATED this 2nd day of June, 2015.

Respectfully submitted,

s/ Mohammad Hamoudi

Assistant Federal Public Defender
Attorney for David Schultz, II

CERTIFICATE OF SERVICE

I certify that on June 2, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

s/ Suzie Strait
Paralegal